

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION**

**DANIEL SARAMA,**

**CASE NO.:**

**Plaintiff,**

**v.**

**UNITED STATES DRUG  
ENFORCEMENT ADMINISTRATION,**

**Defendant.**

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**COMPLAINT (EQUITABLE RELIEF SOUGHT)**

Plaintiff, Daniel Sarama, by and through his undersigned counsel, hereby sues the Defendant, United States Drug Enforcement Administration (“DEA”), and alleges as follows:

1. This is an action for equitable relief under the Freedom of Information Act, 5 U.S.C. § 552.
2. Plaintiff, Daniel Sarama is, and has been at all times material, a resident of Jacksonville, Duval County, Florida.
3. Defendant, DEA, is an agency of the United States Government.
4. Jurisdiction of this action is based on 28 U.S.C. § 1331 because it presents a federal question arising under the Constitution, laws or treaties of the United States.
5. Venue is proper in this judicial district.

6. On or about June 27, 2018, Daniel Sarama submitted a written request for documents to DEA under the Freedom of Information Act. Mr. Sarama's request was submitted by and through his undersigned counsel.

7. On or about July 16, 2018, DEA acknowledged receipt of Mr. Sarama's June 27, 2018 request and provided a case number associated with that request: 18-00868-F.

8. On or about July 19, 2018, DEA again wrote to acknowledge Mr. Sarama's June 27, 2018 FOIA request and assured that the request "is being handled as expeditiously as possible."

9. Despite its assurance, DEA has failed or refused to provide the information requested, despite the passage of more than a year.

10. Pursuant to the Freedom of Information Act, Plaintiff is entitled to the records sought.

11. In the more than one year since Plaintiff made his request, Defendant has never provided any basis for withholding the requested information.

12. Plaintiff has constructively exhausted his administrative remedies.

WHEREFORE, Plaintiff respectfully requests that this Court enter a judgment compelling DEA to provide information responsive to Plaintiff's June 27, 2018 FOIA request, and further requiring DEA to pay Plaintiff's attorney's fees and costs associated with this action.

Dated this 27<sup>th</sup> day of September, 2019.

**SPOHRER & DODD, P.L.**

/s/ Galen D. Bauer

**GALEN D. BAUER, ESQUIRE**

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**Attorney for Plaintiff**